

Exhibit H

Robert Lynn Holley, M.D.

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF WEST VIRGINIA
3 AT CHARLESTON
4 IN RE: ETHICON, INC., PELVIC
5 REPAIR SYSTEM PRODUCTS Master File No.
6 LIABILITY LITIGATION 2:12-MD-02327
7 MDL 2327
8 JOSEPH R. GOODWIN
9 U.S. DISTRICT JUDGE
10
11 GAVIE & KENNETH BEARD,
12 Plaintiffs,
13
14 v. Case No.
15 2:12-CV-02025
16
17 ETHICON, INC., ET AL.
18 Defendants.
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VIDEOTAPED DEPOSITION OF
ROBERT LYNN HOLLEY, M.D.

MAY 16, 2016

10:20 a.m.

1 you saw Ms. Beard was the most common treatment for
2 stress urinary incontinence?

3 A. Retropubic midurethral slings by far.

4 Q. And what about transobturator slings,
5 were those also helping create --

6 A. They came out in 2003, I believe, is the
7 first transobturator sling.

8 Q. And if you saw Ms. Beard in 2012, in
9 that time frame, would there have been a good
10 amount of usage of the transobturator, the TVT
11 sling and data on that, if you know?

12 A. A considerable amount of usage on both
13 of them.

14 Q. Did you personally, Doctor, ever spend
15 time learning about and use the TVT-O?

16 A. We did. We preferred the retropubic
17 sling for several reasons. Number one, because we
18 had much more experience with that than with the
19 transobturator. The other reason is there is
20 compelling evidence in the literature for women who
21 had a more severe type stress incontinence called
22 intrinsic sphincter deficiency. The trials
23 comparing the two types of slings showed that the
24 -- when I say TVT, I just mean retropubic slings in

1 general, never mind what kit -- but that the
2 retropubic sling was more effective for women who
3 had intrinsic sphincter deficiency than the
4 transobturator. Because of the referral center a
5 lot of our patients had the more severe variety of
6 stress incontinence. So, again, we tended to use
7 more of the retropubic slings.

8 We found the retropubic sling was easier
9 to teach than the transobturator. Again, a
10 technical, technical thing. But still we use the
11 transobturator slings for various indications. For
12 instance, if you had a morbidly obese woman, it's
13 easier to do the transobturator than it is the
14 retropubic because they had so much adipose tissue
15 in the suprapubic area -- the trochar, you can't
16 get the trochar through the skin. But you can
17 oftentimes do a transobturator in those patients.

18 Q. Doctor, thank you for setting the ground
19 work. You're welcome to refer to your records in
20 front of you. I'm also going to try to facilitate
21 things a little bit. I'll show you what we've
22 marked -- we're going to mark as Defendants'
23 Exhibit 3.

24 Doctor, before we move completely off of